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K.R.E.F.

Via Facsimile
(502) 573-5622

March 18, 2002

Ms. Rosemary Center
General Counsel
Kentucky Registry
of Election Finance
140 Walnut Street
Frankfort, Kentucky 40601

Dear General Counsel Center:

Thank you for taking the opportunity to speak with me last Thursday, March 14, 2002. I appreciate very much your comments and information regarding the federal election laws and their interpretations as well. We believe that the factual situation that we are presenting in this letter provides a specific set of facts that come within the exceptions established by reason of our client's association with the AFL-CIO.

We represent Local Union 633 of the Plumbers and Steamfitters Union. This is an AFL-CIO union and is located in Owensboro, Kentucky. The union is unaffiliated with any other local unions in any direct manner involving any type of control with any other local union, not only in the Commonwealth of Kentucky, but in the United States. They receive a charter from the United Association of Plumbers and Pipefitters. The charter merely gives them the ability to operate and in no way represents any financial support or control from the International. Our client created its own PAC some time ago. The PAC is not affiliated or connected with any other organization. The PAC is operated by Local 633's Political Action Committee and receives funds only from Local 633.

We are interested in conducting a fundraiser for Larry Sanderson, who is running for the Senate for the Commonwealth of Kentucky from the Paducah region. We understand that two other local unions that are plumber locals in Louisville made contributions to his election committee. Our local union and its Political Action Committee are in no way associated nor receive any funds from either of these local unions. We do not control nor do they have any control or involvement in our local Political Action Committee or our local union. We believe that since we are an AFL-CIO local union, and under your interpretations based upon federal election commission rulings, that our local union should not be considered an affiliated organization for purposes of being able to make contributions to Mr. Sanderson. We believe that our local Political Action Committee is


allowed to make donations as allowed under Kentucky Revised Statutes up to One Thousand Dollars to Mr. Sanderson's election committee, regardless of what other local unions in any trade may do, including local unions that may be plumber and/or steamfitter local unions.

We would like a ruling on this request at your earliest convenience so that we can determine what fundraiser we can provide for the election of Mr. Sanderson.

Thank you again for taking the time to speak with me.

Respectfully yours,

Berger and Berger

By: 
Charles L. Berger

CLB/nas

cc: Bruce Wimsatt

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